

REMARKS

Claims 17 and 19-22 are presented for consideration, with Claims 17, 19 and 20 being independent.

The independent claims have been amended to further distinguish the Applicant's invention from the cited art. Support for Claims 17, 19, and 20 can be found, for example, on page 18, line 1, *et. seq.*, of the specification. In addition, Claims 21 and 22 have been added to provide an additional scope of protection. Support for Claim 21 can be found beginning on page 21, line 11 of the specification, and support for Claim 22 can be found beginning on page 27, line 22 of the specification. Claim 18 has been cancelled.

Claims 17-20 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Schiller et al., U.S. 6,049,339 in view of Moore, U.S. 2002/0015039. The rejection is respectfully traversed.

Claim 17 as amended relates to a method of rendering an image, comprising the steps of receiving an image representation of the image comprising overlapping graphic objects, generating a list of input edges in accordance with boundaries of the overlapping graphic objects, and producing non-intersecting edges from the input edges on a per-scan-line basis. An image is rendered based on the generated non-intersecting edges, wherein the non-intersecting edges form the boundaries of non-overlapping graphic objects that are visually equivalent to the overlapping graphic objects. As also claimed, at least one of the non-intersecting edges is shared by more than one of the non-overlapping graphic objects.

Schiller et al., is directed to blending graphical objects using planar map representations. As Applicant understands, Schiller et al. describes converting graphical objects into a planar map representation by rasterizing the graphical objects into tiles, and assigning a color as a function of the transparency characteristics of the graphical objects. As acknowledged in the Office Action, Schiller et al. does not teach or suggest processing the display representation on a per-scan basis.

Moore was cited to compensate for the deficiencies in Schiller et al. Moore is directed to a method and apparatus for generating instructions for a directed adjacency graph, such as an expression tree, into a raster pixel image having a plurality of scan lines and a plurality of pixel locations on each scan line.

Even assuming, arguendo, Schiller et al. and Moore could have been combined as proposed in the Office Action, the proposed combination of art fails to teach or suggest, among other features, generating a list of input edges in accordance with boundaries of the overlapping graphic objects, and producing non-intersecting edges from the input edges on a per-scan line basis.

As noted above, Schiller et al. does not process the display representation on a per-scan line basis. Moore discloses that when two objects overlap, the object having the higher priority level is rendered “above” the object with a lower priority level (paragraph [0064]). In other words, in Moore the edge of the higher priority object is rendered, while the edge of the lower priority object is not; therefore the process in Moore selects a pre-existing edge from the

object with a higher priority level to be rendered. Moore does not teach or suggest, therefore, producing non-intersecting edges from the input edges on a per-scan-line basis, as set forth in Applicant's Claim 17. The proposed combination of art, therefore, still fails to teach or suggest Applicant's claimed invention.

Claim 19 is directed to an apparatus for rendering an image, and has been amended in the same manner as Claim 17. Applicant therefore submits that Claim 19 is patentable for at least the reasons stated above. Similarly, Claim 20 is directed to a computer readable medium storing a computer program for directing a processor to execute a method for rendering an image. As Claim 20 has been amended in the same manner as Claim 17, Applicant also submits that Claim 20 is patentable for at least the reasons stated above.

Accordingly, reconsideration and withdrawal of the rejection under 35 U.S.C. §103 is respectfully requested.

Thus, it is submitted that Applicant's invention as set forth in independent Claims 17, 19 and 20 is patentable over the cited art. In addition, dependent Claims 21 and 22 set forth additional features of Applicant's invention. Independent consideration of the dependent claims is respectfully requested.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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